

1 **GUTTILLA MURPHY ANDERSON, P.C.**

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8 Attorneys for Chapter 7 Trustee Dina L. Anderson

9 **UNITED STATES BANKRUPTCY COURT**

10 **DISTRICT OF ARIZONA**

11 In re:

Chapter 7

12 DAVID W. REMIERES AND
13 JENNIFER F. REMIERES,

Case No. 2:19-bk-12898-BKM

14 Debtors.

**MOTION FOR EXPEDITED HEARING ON
MOTION TO APPROVE SALE OF REAL
PROPERTY FREE AND CLEAR OF LIENS**

(Hearing requested prior to August 18, 2020)

Re: 9021 W. Elm Street, Unit 3
Phoenix, AZ 85037

Tax Parcel No. 102-83-349

Pursuant to Local Bankruptcy Rule 9013-1(h), Dina L. Anderson, the Chapter 7 Trustee (“Trustee”) in the David W. Remieres and Jennifer F. Remieres (“Debtors”) bankruptcy estate, by and through undersigned counsel, hereby requests an Order setting an expedited hearing on or before August 18, 2020 to consider the *Motion to Approve Sale of Real Property Free and Clear of Liens* (“Motion”).

I. Contact Information for Other Parties

The contact information for the interested parties is set forth as follows and are incorporated herein by this reference:

Dina L. Anderson
Chapter 7 Trustee

Edwin Adrian Perez
edwin.adrian760@gmail.com
Buyer

Office of the U.S. Trustee
230 N. First Avenue, Suite 204
Phoenix, AZ 85003-1706

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3 11225 North 28th Drive, Suite B-103
4 Phoenix, AZ 85029
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6 *Attorneys for Debtor*

7 David W. Remieres
8 Jennifer R. Remieres
9 529 York Avenue
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11 *Debtors*

12 Heena Khatri
13 Principal Real Estate Broker
14 UrbanCiti Realty & Property Management
15 heena@urbanciti.com
16 *Listing Agent*

17 Stephen Chip
18 Tasha Santora
19 Maurice Jackson
20 BK Global Real Estate Services
21 1095 Broken Sound Pkwy NW Suite 100
22 Boca Raton, Florida 33487
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Title Company

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US Bank Home Mortgage
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Owensboro, KY 42301
(Account ending 7416)
Lien Holder

US Bank Home Mortgage
PO Box 790415
St. Louis, MO 63179-0415
(Account ending 7416)
Lien Holder

Maricopa County Tax Assessor
301 West Jefferson St., Suite 100
Phoenix, Arizona 85003
County Tax Assessor/Auditor

AS&A Property Management
c/o Vista Dos Day H.O.A.
3802 N. 53rd Ave. #140
Phoenix, AZ 85031

19 **II. Facts Showing Existence and Nature of Emergency**

20 1. On October 9, 2019, the Debtors filed a Voluntary Petition for relief under Chapter
21 7 of the Bankruptcy Code.

22 2. Dina L. Anderson is the duly appointed Chapter 7 Trustee assigned to this case.

23 3. On August 3, 2020, the Trustee filed the *Motion to Approve Sale of Real Property*
24 *Free and Clear of Liens* ("Motion").

25 4. The Trustee requires an expedited hearing on the Motion as the Buyer requires the
26 sale to close by August 24, 2020.

27 5. Any additional delay in entering an order approving the Motion could jeopardize
28 the Property and the sale to the Buyer.

6. As such, cause exists for this Court to set an expedited hearing on the Motion.

III. Notice of Accelerated Hearing

Copies of this motion were mailed, and sent via facsimile and/or e-mail where such contact information was available, to the Debtors, the Debtors' Attorney, the Trustee, the United States Trustee, the Trustee's court-appointed Realtor, the Buyer, the lender, Attorney for lender, any other prospective buyers and to any other parties requesting notice in this case.

WHEREFORE, Trustee respectfully requests that this Court set an expedited hearing on the Motion on or before August 18, 2020.

RESPECTFULLY SUBMITTED: August 3, 2020

GUTTILLA MURPHY ANDERSON, P.C.

/s/ Dawn M. Maguire #20368
Dawn M. Maguire
Attorneys for Chapter 7 Trustee

E-FILED on August 3, 2020 with the U.S. Bankruptcy Court and copies served via ECF notice on all parties that have appeared in the case.

COPY mailed and/or emailed the same date to:

Dina L. Anderson
Chapter 7 Trustee

Office of the U.S. Trustee
230 N. First Avenue, Suite 204
Phoenix, AZ 85003-1706

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12 *Title Company*

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/s/ Monica J. Baca